

U. S. Environmental Protection Agency

Region III

NAAS Inspections

Date of Report 8/24/88 EPA Inspector Dave O'Brien

Agency Audited DCRA

A. Pre-inspection Audit (File Search Information)

1. Facility Information

Inspected Facility: PEPCO Benning

CDS Number: 09-0020-00001

Facility Type: Electric Generating Station

Facility Location: 3400 Benning Road, NE

Facility Contact: Richard Bissett /Gary Beeson /Kevin Mcleod

Contact Title: Plant Manager /Envirn. Mgr. /Envirn. Coor.

Phone Number: (202) 388-2501 / (202) 331-6542 / (202) 872-3349

Number of Previous Inspections: 12 Date of Last Inspection: 2/23/88
Since January 1984

Number of Inspections in First Year: 4 in 1987

Number of Inspections in Second Year: 2 in 1986

Applicable Agency Regulation

Type of Inspection: SIP X

NSPS

NESHAP

PSD

Other

Were all sources of air emissions reviewed during the previous inspection?

Yes X No

If "No" Why?

2
NAAS Inspections

Which portions were inspected? 4 boilers: Units 1, 2, 15, & 16.
15-16 main units-all burn #4 fuel oil; 15-16 also burn #2. Units 1-2
are package units-heat for plant & pre heat oil.

Extent of Documentation:

Visible Emissions (Duration): issued VE violation

Samples: Fuel oil for sulfur analysis on file.

Production Records Reviewed: _____

Control Equipment Operating: yes

Parameter Reviews: opacity

Other: _____

A. Pre-Inspection Audit:

1. Facility Information:

Current Facility Compliance Status: violations of VE recorded.

See attached sheets for VE inspections.

State Action Taken: Fines

II. Agency Inspector Experience

Inspector's Name: John H. Holmes

Title: Environmental Health Tech.

Phone Number: (202) 767-7370

Visible Emissions Certification Date: April 1988

Location: Annandale, Va.

Certifying Agency: VaSAPCB

Number of Years Experience: 26

NAAS Inspections

Type Industries Inspected: All stationary sources in D.C.
Power Plants, Generating Stations, Asphalt Plants, Asbestos
Demo/Reno

Experience - Other Programs: PHS, Chemistry; Continental
Oil Co. - organic analysis.

Type of Inspection Reports

Written inspection forms, send EPA narrative & form
Oral _____
Notes for File weekly reports to program manager

Type of State Guidance Given to Inspector Prior to Conducting Inspections
(if written obtain a copy): Smoke School, AHERA training, microscope
training for asbestos;

Extent of Pre-inspection Review Conducted by Inspector Review file

B. Inspection Audit

1. Date of Inspection 8/24/88

Facility Personnel Contacted: Richard Bissett, Kevin McLeod,
Gary Beeson

Was Entire Facility Inspected: Yes as good as possible since the
boilers were down. Checked the two opacity recorders.

If "No" Why? _____

NAAS Inspections

Which Portion were Inspected? 15 & 16 down. In 1987 the boilers
operated an ave. of 12% of time. Each unit is 35 Mega Watt. Checked
opacity charts & units in stack.

Were All Sources of Air Emissions Reviewed? Yes X No

II. Extent of Documentation

Visible Emission Sources/Time TECO dual cell- also zeropipe
check-auto span filter; same units of 15 & 16

Samples Obtained: No not operating

If Samples Obtained, are chain-of-custody Procedures Followed?

Yes No

Explain

Type of Production Records reviewed None at time of inspection. PEPCO
submits monthly fuel oil usage records. John Holmes also questioned
PEPCO about burning waste oil under RCRA. We were told that the oil is
in plant generators and motor mineral oil or lubricant oil. The oil is
not from motor vehicles or other plant locations. They burn about
2000 gals/yr of oil and a couple hundred gals. of cleaning slovent a
year.

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Control Equipment Operating? Yes _____ No XSourceTypeUnit 15 boilerTECO opacity CEMUnit 16 boilerTECO opacity CEM

Operating Data/Parameter Reviews? Yes _____ No _____

If "No" Why? units down

III. Applicable Regulations
 Was Facility Inspected Regarding
 Compliance with all Applicable
 Regulations? Yes X No _____

SIP X VE & Sulfur
in fuel oil
 NSPS _____
 NESHAPS _____
 PSD _____
 Other _____

C. Post - Inspection Audit

1. State Inspector's Report

Does State Inspector's Written Report Accurately Document
 Observations Made During Inspection, and to What Extent?

Yes X No _____

Timeliness of Report (Comments): inspection was Aug. 24, 1988
and ESD received report on Aug. 31, 1988.

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How does this Inspection Compare with Previous Year Inspections in
Comprehensiveness (Comments): Good. No VE was taken because
units were down. However, waste oil burning was investigated and
five citations were issued- see attached report

Conclusions/Recommendations: DCRA inspection was thorough and
follow-up action was quickly taken by issuing five citations on
August 26, 1988.

DEPARTMENT OF CONSUMERS AND REGULATORY AFFAIRS
HOUSING AND ENVIRONMENTAL REGULATIONS ADMINISTRATION

ENVIRONMENTAL CONTROL DIVISION

5010 OVERLOOK AVENUE, S.W.

WASHINGTON, D.C. 20032-5397

Compliance Data System

Inspection Report

Registration No. 0001

Compliance Status: 41

Name of Facility: Potomac Electric Power Company
Benning Generating Station

Address: 3400 Benning Road, N.E.

Owner: Potomac Electric Power Company

Date of Inspection: August 24, 1988 & August 26, 1988

Person Contacted: (See listing on reverse side)

Personnel Conducting Inspection:

1. John H. Holmes/ECD
2. Dave O'Brien/EPA (Inspection was being audited by EPA representative.)
3.
4.

Remarks: (SEE attached write-up)

John H. Holmes August 26, 1988
Inspector Date

Pepco personnel:

R.T. Bisset, Plant Manager
Dale Ream, Plant Engineer
Kevin McLeod, Environmental Specialist
Production Group
Gary Beeson, Environmental Engineer
Air Quality Department

On Wednesday, August 24, 1988, John H. Holmes, EHT, CES, who was accompanied by Dave O'Brien, EPA * Region III, Philadelphia, inspected the Potomac Electric Power Company's Benning Generating Station. The inspection was a three-fold examination intended to check on the soot and/or metal emissions coming from either unit 15 or 16 that were reported by the National Park Service personnel; to learn with certainty whether or not Pepco was burning waste oil at the facility as was previously reported by George Gurley of the Riverview Terrace, and to make a second "annual" Compliance Data System inspection so that Mr. O'Brien could observe the inspector's techniques.

At the outset of the meeting, M I inquired of Mr. Bisset about the emissions reported by the NPS personnel. Mr. Bisset said that an inspection showed that an 1,800 lb. steam-line burst about that time which may have caused the particulate matter, both metal and non-metal, to be blown out of the stack. He further stated that there was about a four-day lapse of time between when the incident occurred and when it was reported by the NPS. Mr. Bisset has been in contact with the NPS people in order to reconcile the situation. The emissions were not caused by soot blowing as Pepco washes down their boiler; they do not blow the soot from them.

At this juncture, the participants turned their attention to the reported use of waste oils - or in this case waste fuels as solvents are also being burned. (See the August 24th edition of The Washington Times for additional information about this problem.)

Kevin McLeod said that the plant disposes of - by burning - approximately 2000 gallons of waste oil (waste lubricants) and about 200 gallons of solvents per annum in the boilers. He further stated that permission to burn these fuels was granted by the Environmental Protection Agency under the Resource Conservation and Energy Act with a notice having been sent to the Pesticides and Hazardous Waste Section of ECD. (This statement was later rescinded by Gary Beeson, who said that the reverse was true: that P&HW had approved the burning of waste fuels on January 26, 1986, and that EPA had been notified.)

Mr. Bisset explained that the plant is a peaking facility. It is only operated during demand periods, i.e. as the extremely hot spell experienced during July and August, and during the winter months when the heating needs are the greatest. No use is made of the plant during the spring or fall months.

(A further reduction of the power requirements is expected in the near future, as no. 1 unit of the Peachbottom Nuclear Power Plant near York, Pennsylvania, which is operated by Philadelphia Electric Company, is expected to be back on line by August 31st. No. 2 unit is also expected back sometime after Labor Day.)

The participants, with the exception of Mr. Roan, then toured the plant. As the plant was not functioning, the continuous emission monitors were also not operating. The television cameras were positioned on the stacks in accordance with the requirements. A check was made of the transmitters.

The following day, Thursday, August 25th, a meeting was held in the office of Joseph K. Nwude, Chief, Air Quality Control and Monitoring Branch. Present besides Dr. Nwude were Donald E. Wambsgans, Chief, Engineering Services Section, and Claud B. Jones Jr. and John H. Holmes, Chief and Inspector, respectively of the Compliance and Enforcement Section. A review was made of John Holmes' inspection of the previous day and the article that appeared in the paper. It was decided that Mr. Holmes would issue a citation on Pepco's management for five and maybe six violations of the Civil Infracton regulations.

On Friday, August 26, 1988, I served tickets for five violations. These tickets were served on Dale Roan, Acting Plant Manager. Later in company of the plant personnel, I checked the sump and found about 2 - 3 inches of sludge in the bottom. The tank is about four feet deep and one foot in diameter. Mr. McLeod said that the oil was only "recently" burned, and no more will be burned for at least 2 months. Since there was no representative oil in the sump, no samples were taken. I plan to take samples when there is sufficient oil in the sump.

JH

Continuous Emission Monitors?

Yes, report attached NO

Compliance Status

	Source:	Status
1.	(type) <u>Unit 15</u>	<u>41</u>
2.	(type) <u>Unit 26</u>	<u>41</u>
3.	(type) _____	_____
4.	(type) _____	_____
5.	(type) _____	_____
6.	(type) _____	_____

Enforcement Actions:

CONTINUOUS EMISSION MONITORS INSPECTION

CHECK LIST

Name of Facility: Petomac Electric Power Company
Benning Generating Station

3400 Benning Road, N.E.

Owner: Petomac Electric Power Company
1900 Pennsylvania Ave., N.W.

Person-in-charge: R.T. Bisset, Plant Manager

Person Contacted: R.T. Bisset & et al.

Date of Inspection: August 24 and 26, 1988

Time of Inspection: From: 9:30 AM To: 11:00 AM

Division Personnel Conducting Inspection

1. John H. Holmes
2. _____
3. _____
4. _____

Inspection was witnessed by Dave O'Brien, EPA - Region

III.